

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ISCONSIN**

BAD RIVER BAND OF THE LAKE
SUPERIOR TRIBE OF CHIPPEWA
INDIANS OF THE BAD RIVER
RESERVATION

Plaintiff,

v.

ENBRIDGE ENERGY COMPANY, INC.,
and ENBRIDGE ENERGY, L.P.

Defendants.

Case No. 3:19-cv-00602

ENBRIDGE ENERGY, L.P.

Counter-Plaintiff,

v.

BAD RIVER BAND OF THE LAKE
SUPERIOR TRIBE OF CHIPPEWA
INDIANS OF THE BAD RIVER
RESERVATION and
NAOMI TILLISON, in her official capacity

Counter-Defendants.

Judge William M. Conley Magistrate
Judge Stephen Crocker

BAD RIVER BAND'S COUNTER-OBJECTIONS AND
COUNTER-DESIGNATIONS TO ENBRIDGE'S OBJECTIONS AND
COUNTER-DESIGNATIONS TO THE BAD RIVER BAND'S
DEPOSITION DESIGNATION

**ABBREVIATION AND FEDERAL RULE OF EVIDENCE KEY FOR
ENBRIDGE'S OBJECTIONS TO THE BAND'S DEPOSITION DESIGNATIONS**

LETTER	OBJECTION	APPLICABLE RULE(S)
AAA	Asked and answered	
AF	Assumes facts not in evidence	611(a)(1)-AF
ARG	Argumentative	611(a)(3)
AWQ	Answer without question	
CLC	Calls for a legal conclusion	602
COMP	Compound question	611(a)(1)-COMP
CS	Calls for speculation	602
F	Lacks foundation	602, 901
H	Inadmissible hearsay	801, 802, 805
HYPO	Improper/incomplete hypothetical	611(a)(1)-HYPO
I	Incomplete	106, 401, 402, 403
INCOMP	Incomprehensible	
L	Leading	611(c)
LA	Legal argument	LA
MIS	Misleading question	611(a)(1)-MIS
MT	Misstates testimony	611(a)(1)-MT
OBJ	Improper designation of objection	
PK	Witness lacks personal knowledge	602
QWA	Question without answer	
R	Relevance	401, 402, 403
SCOPE	Beyond the scope of the 30(b)(6) notice	FRCP 30(b)(6)

V	Vague	611(a)(1)-V
403-C	Cumulative, waste of time	403-C
408(a)	Improper use of settlement evidence	408(a)
701	Improper opinion testimony by lay witness	701
1002	Best evidence	1002

FRCP 30(b)(6) DEPOSITION OF ENBRIDGE (MATTHEW KINDRED; 06/02/2022) –**DESIGNATIONS; OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
5:19-22						
6:24-7:11						
8:3-12:20						
19:10-21						
20:7-9						
20:20-21:10						
22:13-23:4						
23:12						
23:17-30:18						
*31:1-17						
*31:21-32:6						
*32:9-34:14						
*34:17-23			53:17-54:24; 58:4-18			
*35:2-10			53:17-54:24; 58:4-18			
35:15-16						
36:14-38:19	ARG; L					
39:8-42:24	N/A. Counsel statement		42:25-43:8	Improper Designation of Attorney Statement		
41:12-42:24	N/A. Counsel statement			Plaintiff withdraws designation of 41:12-42:24		
43:22-44:24 ¹						

¹ This designation was inadvertently left off the original FRCP 26(a)(3)(ii) deposition designation table (Dkt. 421-1). Enbridge has not had a chance to object and/or counter-designate at the time of this filing.

*45:6-14	F; CS					
*45:18-61:22						
*62:6-74:2						
*74:5-83:3						
83:15-87:19						
87:22-88:9						
88:19-91:18						
92:8-10	N/A. Counsel statement			Plaintiff withdraws designation of 92:8-10		
*92:24-97:1		97:2-12				
97:13-15		97:2-12; 97:16-98:9				
98:10-102:13		108:6-22 121:7-122:15	121:7-122:15 – Improper Designation Outside Scope of Designation (FRCP 32(6)), Direct (FRCP 30(c), FRE 611)			
102:15-108:5						
108:23-109:11	CS; CLC; AF; L					
*109:15-112:8		112:9-16				
112:17-113:20						
114:1-9		114:10-15				
114:16-115:10						
115:13-116:24	SCOPE; ARG N/A. Counsel statement			Plaintiff withdraws designation of 115:23-116:24		
117:16-24	N/A. Counsel statement			Plaintiff withdraws designation of 117:16-24		
118:6-13	NA. Counsel statements			Plaintiff withdraws designation of 118:6-13		

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

FRCP 30(b)(6) DEPOSITION OF ENBRIDGE (STEPHEN LLOYD; 06/29/2022) –**DESIGNATIONS: OBJECTIONS AND RULINGS**

Plaintiff objects to counter-designations by defendants that are within portions of the individual expert deposition transcript of Stephen Lloyd, an Enbridge employee (pages 1-206). Plaintiff designated testimony only from the 30(b)(6) deposition of Enbridge on oil spill response, in which Enbridge designated Mr. Lloyd to testify on its behalf (pages 206-224). Testimony from the deposition of Mr. Lloyd taken in his individual capacity cannot be used to counter 30(b)(6) testimony given by Enbridge merely because it occurred on the same day; legally these are two separate depositions and Mr. Lloyd indicated his understanding of this (5:21-6:8; 206:19-25). Moreover, out of court testimony of Mr. Lloyd is hearsay, Enbridge did not designate any testimony from Mr. Lloyd's individual deposition, and Enbridge has listed Mr. Lloyd as a witness it will call at trial, so his individual testimony is not admissible under Fed. R. Civ. P. 32.

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
206:10-207:10						
209:3-7			26:11-20; 48:12-49:4; 74:8-75:9; 132:25-133:19; 140:19-144:11; 157:25-158:17; 208:13-24; 209:16-24	26:11-20 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				48:12-49:4, 49:7-11, 49:19-50:15 Plaintiff's Objections Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				74:8-75:9 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				132:25-133:19 Plaintiff's Objections Improper Designation of Testimony Outside		

			of Scope of FRCP 32(6). 141:14-142:17 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
			144:3-11 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
			157:25-158:17 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
210:18-20; 210:22-211:1		26:11-20; 74:8-75:9; 132:25- 133:19; 134:4-24; 209:16-24	26:11-20 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 74:8-75:9 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 132:25-133:19 Plaintiff's Objections Improper Designation of Testimony Outside	

			of Scope of FRCP 32(6).		
			134:4-24 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
212:3-5; 212:7-12	CS	26:11-20; 74:8-75:9; 78:25-79:16; 200:4-11	26:11-20 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			74:8-75:9 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			78:25-79:16 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			200:4-11 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			Answer without Question		
212:21-213:6 213:8-214:4		74:8-75:9; 100:8-101:25; 110:24-111:14; 132:25-133:19;	74:8-75:9 Plaintiff's Objection		

		134:4-24; 209:16- 24	Improper Designation of Testimony Outside of Scope of FRCP 32(6). 100:8-101:25 Plaintiff's Objections Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
		110:24-111:14	Plaintiff's Objections Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
		132:25-133:19	Plaintiff's Objections Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
		134:4-24	Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).	
214:22-24 215:1-215:7		26:11-20; 74:8-75:9; 100:8-101:25; 110:24-111:14; 132:25-133:19; 134:4-24	26:11-20 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 74:8-75:9 Plaintiff's Objection	

			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			100:8-101:25 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			110:24-111:14 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			132:25-133:19 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			134:4-24 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
215:24-216:1 216:3-11			26:11-20; 49:7-11; 49:19- 50:15; 74:8-75:9; 100:8-101:25; 110:24-111:14; 216:15-217:3	26:11-20 Plaintiff's Objection	
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			48:12-49:4, 49:7- 11, 49:19-50:15 Plaintiff's Objections		

			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			74:8-75:9 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			100:8-101:25 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			110:24-111:14 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
217:4-5; 217:7-14		74:8-75:9; 118:11-119:17; 134:4-24; 209:16- 24	74:8-75:9 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			118:11-119:17 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			134:4-24 Plaintiff's Objection		

				Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
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Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
218:19-20; 218:22- 219:17; 219:23-24			74:8-75:9; 150:21-22; 151:10-19; 219:21-22; 219:25-220:1	74:8-75:9 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 151:10-19 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
220:3-5	CS		17:23-18:12; 51:14-25; 52:9-15; 74:8-75:9; 137:10-24; 220:6-12	17:23-18:12 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 51:14-25 Plaintiff's Objections Improper Designation of Testimony Outside of Scope of FRCP 32(6). 52:9-15 Plaintiff's Objections Improper Designation of Testimony Outside		

			of Scope of FRCP 32(6).		
			74:8-75:9 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6). -----		
			137:10-24 Plaintiff's Objections		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
220:13-14; 220:20-24	.	17:23-18:12; 74:8-75:9; 194:16-23	17:23-18:12 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			74:8-75:9 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
			194:16-23 Plaintiff's Objection		
			Improper Designation of Testimony Outside of Scope of FRCP 32(6).		

ERCP 30(b)(6) DEPOSITION OF ENBRIDGE (JOHN MCKAY; 05/19/2022) –**DESIGNATIONS: OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
12:18-20						
21:12-19						
21:24-22:2						
22:7-23:8			68:16-69:8			
24:9-14	AWQ		24:4-7			
24:19-22	AWQ		24:16-18			
26:18-28:2						
29:10-19						
30:1-13						
30:25-31:21						
33:4-21						
34:6-17						
35:19-36:10	QWA		36:15-16			
36:17-23						
37:12-25			38:1-6			
38:7-10						
38:12-21						
42:20-43:3						
43:17-44:11			43:12-16			
53:13-17			53:18-54:3			
59:20-24	LA		59:25-60:1			
60:2-4						
63:21-25	INCOMP		63:20			
65:17-66:2			66:3-7; 68:16-69:8			
66:12-16			66:20-23	66:20-23 Plaintiff's Objection Answer without a Question		
67:9-25			68:1-2; 68:16-69:8			
68:3-4						
74:6-7	AAA		43:17-44:2; 74:8-9; 68:16-69:8			
74:10-20						
80:2-6	AWQ		79:20-24			
83:12-19	F; CS; AWQ		83:8-11; 82:16-82:22	82:16-22 Plaintiff's Objection Answer without a Question		
85:9-19						

85:24-86:6						
86:13-15						
86:18-23 87:3	INCOMP; CLC		86:24-25			
87:10-13 87:16-25	CLC		87:14-15			
88:19-89:13						
90:11-15						
90:20-91:15						
91:18-19	QWA		91:20-92.:8			
95:18-25						

ERCP 30(b)(6) DEPOSITION OF ENBRIDGE (KEITH PARKER: 05/25/2022)**DESIGNATIONS: OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
11:5-19						
13:3-14						
14:22-16:18						
16:22-17:4						
17:20-18:18			17:5-10			
19:3-20:11			20:12-14; 20:17-23			
20:25-21:11			21:12-17; 21:21-24			
22:11-23:17			23:18-23:23			
24:4-25						
25:18-26:11						
26:15-28:8	ARG; MIS; AAA		23:18-23:23; 20:12-14; 20:17-23			
30:5-31:7	F		31:8-32:12			
*32:14-33:22	F					
37:18-38:21	V					
42:11-13 42:17-21	L; ARG; MIS; AAA		39:14-41:7; 41:15-22; 42:23-43:19			
44:12-14 44:18-20	AAA; MIS; ARG		39:14-41:7; 41:15-22; 42:23-43:19			
45:5-17						
46:1-22	MIS					
50:1-14	MIS					
50:16-51:23						
52:17-53:5			52:5-14; 53:6-10; 54:1-18			
57:11-23						
59:20-60:23			59:9-59:19			
61:8-10			61:11-14			
61:15-21			61:11-14			
*61:23-65:16	F		65:17-69:7			
74:11-76:9			76:11-77:14			
81:24-82:12			80:18-81:17; 82:13-83:24			
84:1-10			84:11-19			
84:20-85:2			85:3-86:7			
87:15-93:15	AAA; SCOPE; MIS; ARG					

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

FRCP 30(b)(6) DEPOSITION OF ENBRIDGE (DEB TETTAH-WAYOE; 06/30/2022 & 08/16/2022) –

DESIGNATIONS; OBJECTIONS AND RULINGS

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
7:7-16						
8:3-7						
9:15-20						
9:23-25						
11:12-16						
11:19-12:1						
12:8-17						
12:25-13:6						
13:11-12						
13:18-14:15	SCOPE & R					
13:18-14:15	(DUPLICATE)					
*15:10-22	SCOPE & R					
*15:25-16:2	SCOPE & R					
17:2-6	SCOPE & R					
*17:7-18:10	SCOPE & R					
18:21-19:10		18:13-18				
19:18-20:6	COMP					
20:8-22:16						
22:21-23:3						
23:5-20						
24:6-25:5						
25:9-10						
*25:24-26:21						
27:8-24						
28:1-4		28:5-18				
28:22-29:3	QWA					
33:8-19						
*34:7-8						
*34:10-12			34:7-8; 10-16			
*34:20-24						
35:2-3						
*36:12-36:20						
36:22-37:2						
37:12						
37:20-23						
39:5-10						
39:16-23						
40:23-41:23						

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
43:6-25						
44:16-45:4						
46:5-46:4	(INCORRECT DESIGNATION)					
46:21-48:14	F					
48:20-24	F; QWA					
49:10-50:7	F					
50:12-51:4		50:6-20				
51:21-23	F		51:23-52:3			
53:17-21	F					
54:1-55:1						
55:14-20						
55:22-23	MT; QWA		56:1-2			
56:5-13						
56:20-21						
57:2						
*58:23-59:6						
59:8						
59:18-20						
60:6-61:7						
61:13-17						
61:19-21	QWA; R					
62:10-66:18	R; H; N/A Counsel Statement			Plaintiff withdraws designation of 62:10-66:18		
76:17-22						
78:21-79:3						
79:23-80:5						
80:8-14		80:15-81:2				
82:3-25	COMP					
83:15-85:9						
85:12-15						
86:10-19						
87:17-18						
*88:7-9	F					
*88:11-23	F					
89:5-10	F; AAA					
89:22-23						
90:10-18						
90:24-91:5						
91:11-16						
92:15-19	COMP					

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
93:1-94:3			92:22-25			
94:9-14						
95:15-22			95:23-96:6			
96:7-23	HYPO					
96:25-97:19						
97:22-98:5						
98:18-24			98:12-17; 99:6-9			
99:1-5	AWQ		98:25			
99:13-22			98:25			
100:3-17			99:23-100-2			
100:23-101:3			100:18-21	100:18-21 Plaintiff's Objection Improper Designation of Attorney Statement		
*101:9-13			101:4-16			
101:17-20			102:1-9			
105:3-20						
*106:2-107:18			107:19-108:5			
108:18-25						
110:8-23			111:2-8			
111:24-112:3			112:4-8			
113:3-115:3			115:4-6			
115:7-15						
*115:19-118:7						
*118:10- 119:21						
120:7-11			120:2-6; 12-20	120:2-6 Plaintiff's Objection Answer Without a Question		
121:1-6			121:7-18			
121:19-125:13						
125:23-126:4	AWQ		125:15-20 (Q)			
126:21-23	SCOPE		126:24			
127:1-4	SCOPE		127:9-14			
127:18-128:6	AWQ; SCOPE		128:8-18			
128:19-131:21	F					
132:6-12	SCOPE					
*132:18-21	SCOPE		132:22-25			
133:1-2			133:3-6			

133:7-134:12	SCOPE					
134:25-135:7						
135:21-23			135:24-136:3			
136:10-15						
*137:14-138:23	F; SCOPE (137:14-21)		138:24-139:1; 139:5-15			
139:16-19			139:20-22			
140:3-10			139:20-140:2			
141:6-7			141:8-9			
141:10-11			141:12-13; 16-21			
143:2-12						
146:9-15						
146:16-23						
148:2-149:23						
*150:2-19	INCOMP		149:24-150:1			
151:15-18						

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

FRCP 30(b)(6) DEPOSITION OF ENBRIDGE (TRENT WETMORE: 06/28/2022) –**DESIGNATIONS; OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
12:7-13:19						
16:16-17:1			17:2-9			
25:2-3			25:4-6			
25:7-20			25:21-25			
26:4-15						
26:22-27:1						
27:21-28:6			28:7-17			
28:1-2						
29:5-13			29:14-19			
29:20-30:7			30:18-21	30:18-21 Plaintiff's Objection Answer without a question		
30:22-24			30:25-31:11			
30:2-17						
36:1-14						
38:4-39:12	F		39:13-40:3			
40:5-24			40:25-41:8			
42:14-43:7						
46:13-19			46:9-10; 46:21-47:8			
47:21-48:1						
48:8-50:7			50:8-9			
51:2-22	F (51:2-8)					
53:4-54:8	F		54:9-21			
54:22-55:17						
58:12-21						
59:3-13			58:22-59:2; 59:14-61:4			
61:5-10	F		61:11-12			
62:10-63:8						
65:2-6						
65:25-66:12						
66:22-67:17			67:18-68:10			
68:11-68:20			68:21-69:1; 69:17-70:4			
70:13-72:6			72:7-10			
72:13-72:20			72:21-73:12			
73:13-22	F					

74:5-9	F					
75:10-16						
76:1-18			76:19-77:4			
77:5-16			77:17-80:17			
80:18-81:18						
82:9-83:3			83:4-12; 84:8-12			
84:16-85:8			85:9-15			
85:16-20			86:14-19			
86:9-13	F; R					
87:23-88:6	SCOPE					
90:18-20	408(a); Mediation Agreement					
90:23-25	408(a); Mediation Agreement					
91:4	408(a); Mediation Agreement					
91:20-22			91:23-92:6			
92:7-93:22						
93:6-24	408(a); Mediation Agreement					
94:6-22			94:23-95:2			
95:3-96:2	408(a); Mediation Agreement		96:3-97:2			
97:3-99:2 99:11-100:24			99:3-10			
101:1-6			101:7-11			
101:12-24			101:25-102:4			
102:5-12			102:13-105:7			
105:8-24			105:25-106:7			
106:8-107:22			107:23-108:13			
108:14-19			108:23-109:3			
109:4-6			109:7-17			
109:24-110:3			110:4-17			
110:18-21			110:22-111:11			
111:12-19			111:20-112:1			
112:2-13			112:14-25			
115:21-116:7	F		115:13-20; 116:8-9			
116:10-12			116:13-15			
117:12-21						
118:5-21			118:22-119:6			
119:7-120:2 120:7-10			120:3-6			
121:6-10			120:19-121:5; 121:11-17			

122:20-123:2	SCOPE		123:3			
123:5-124:5						
126:1-126:4	HYPO; F		124:17-125:25; 126:5-6			
126:7-12						
128:10-18			127:25-128:9; 128:19-129:3			
129:4-7			129:8-20			
129:21-23 130:4-5			130:1-2			
130:8-131:25			130:7; 132:1-4			
132:5-9			132:10-133:13			
133:14-24			133:25-134:7			
134:8-10			134:11-13			
134:14-24			134:25-135:10			
135:11-13						
135:20-136:1	F; SCOPE		135:16-19			
136:18- 137:12			136:3-17; 137:13- 138:10			
138:12-139:8			139:9			
139:10- 141:18	F; SCOPE		141:20-142:16			
142:18-143:6	F; SCOPE		143:7-143:22			
143:24-144:5	SCOPE; F					
147:2-147:7			146:16-147:1; 147:8-148:19			
*148:21- 149:20	F SCOPE					
150:7-152:5	H; N/A Counsel Statements; SCOPE (151:14-16)			Plaintiff withdraws designation of 150:7-152:5		
160:2-7			160:8-14			
160:17-22						
164:17- 165:19			165:20-166:4			
166:5-14	F					
166:16-17	F					
167:7-20	F		167:21-168:1			
168:2-6	F; HYPO		168:7-10			
168:11- 169:17						
170:8-171:1	F		171:2-10			
171:16-20	F		171:21-172:3			
172:5-174:15	F; SCOPE					
174:21- 175:20	F		175:21-25			
176:1-177:15	F; N/A Counsel Statement; H			Plaintiff withdraws designation of 176:14-177:15		

178:2-22			177:17-178:1; 178:23-179:15			
179:16-22			179:23-180:10			
180:18-181:9			181:10-19			
182:16-183:6						
183:21- 185:24	F		185:25			
186:1-2 186:10-16			186:3-9; 186:17- 187:12			
187:13-22	HYPO		187:23-188:3			
188:7-189:5	F					
193:2-5	F; HYPO		192:23-193:1			
193:2-194:24	F; HYPO		194:25-195: 3			
195:4-16			195:17-22			
195:23-196:9			196:10-23			
*196:24- 198:14	F					
199:1-8 199:25-201:9	F; HYPO		199:9-24			
202:15-17	HYPO		202:20-24			
202:25- 203:23			203:24-204:2			
204:6-18			204:19-205:19			
205:22- 206:12	F		206:13-207:3			
207:4-14						
208:12-209:7			208:3-11; 209:8- 210:5			
210:6-14						

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

FRCP 30(b)(6) DEPOSITION OF ENBRIDGE (TRENT WETMORE: 06/29/2022) –
DESIGNATIONS; OBJECTIONS AND RULINGS

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
6:25-7:7			7:8			
7:9-8:8			8:9-22			
8:23-9:24	F		9:25-10:14			
12:6-12	408(a); Mediation Agreement					
14:3-24	408(a); Mediation Agreement		16:19-24; 17:2-23; 20:14-21; 20:23- 21:4; 21:6-21:16	16:19-24 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 20:14-21 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 23:23-21:4 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). -----21:6-16 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
17:24-18:7	F		18:8-15			

21:19-24			21:25-22:7; 22:10-15			
24:22-25:6	408(a)		24:16-19			
25:23-26:12			26:13-27:13			
27:18-28:15	F		27:14-17; 28:18-19			
29:2-9			29:10-30:15			
29:20-25	F					
34:20-35:20			36:8-37:19			
37:20-28:11	I (Typo in designation)		38:18-39:24; 40:4-42:20	38:18-39:24 Plaintiff's Objection		
				Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				40:4-42:20 Plaintiff's Objection		
42:21-43:17			43:18-21			
45:18-46:9			46:10-47:10			
48:1-17			48:18-49:4			
49:5-18			49:19-50:20			
50:21-51:23						
*53:23-54:2			54:3-55:3			
56:14-57:8	F		57:9-10; 57:13-18			
57:19-58:3	F					
59:8-22	F					
62:14-19			61:13-19; 61:21-62:13; 62:20-63:6			
63:20-25			63:14-17; 64:1-67:13			
67:14-68:12			68:13-69:15			
72:4-7			71:25-72:3			
73:19-74:18						
78:18-79:11			79:12-80:8			
80:22-82:6						
87:16-25			87:13-15			
88:15-18			88:1-14; 88:19-89:15			
*100:2-6			100:7-101:24			
*107:8-108:6			108:7-19			

122:11-125:11						
127:17-128:11	F		127:14-16			
130:6-13			129:21- 130:5; 130:14-132:4			
132:5-9						
133:5-9			132:20-133:4; 133:10-14			
133:15-22			133:23-134:18			
136:7-138:12			134:19-135:12; 136:5-6			
141:5-142:12	F		140:19-141:4; 142:13-16			
145:12-19	F		145:11; 145:20- 146:11			
146:12-19	F		146:20-147:16			
148:12-19			148:9-11; 148:22- 149:8			
150:5-8			149:22-150:4; 150:9-151:19			
153:19- 154:18			153:14-18; 154:19-155:23			
168:24-169:6	F		169:7-13			
170:9-13						
172:22- 179:21	F		172:13-21; 179:22-180:22			
179:8-21			181:9-18			
180:23-181:8			180:20-22			
182:19-184:1			184:2-7			
190:20-191:4			191:5-192:11			
202:5-12			201:25-202:4; 202:13-203:17			
205:4-17			204:15-205:3; 205:18-206:20			
207:12- 208:12			206:21-207:11; 208:13-210:1	208:19-210:1 Plaintiff's Objection Improper Designation Outside the Scope of FRCP 32(6)		

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ERCP 30(b)(6) DEPOSITION OF ENBRIDGE (ROBERT YAREMKO; 08/15/2022)**DESIGNATIONS: OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
9:13-10:8						
11:11-22						
16:19-17:23	V; OBJ					
18:1-20:25	AF					
22:3-23:1	R					
23:14-24:11	R; L		72:5-8			
*27:9-28:10	R					
*28:17-29:1	R		29:4-11			
*29:15-30:19	ARG; CS; F OBJ; SCOPE; R		30:21; 30:24- 31:2.			
*31:10-19	OBJ; R		33:7-14; 33:16; 34:10-35:5; 35:13-14			
*41:18-42:15	F; COMP; MIS; OBJ; V		40:16-41:16; 54:3-10			
*43:2-25	MIS; OBJ; ARG; SCOPE		40:16-41:16; 54:3-10; 55:2-20	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		
47:9-17-48:23	SCOPE; R; ARG		40:16-41:16; 54:3-10; 55:2-20	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		
*52:3-10						
*53:1-7						
61:18-63:23	F; R; SCOPE CS;		40:20-41:16; 54:3-10; 63:24- 63:25			
64:1-12	SCOPE; R; AWQ		63:24-63:25			

*64:20-65:25	F; R					
67:6-15	F; R; AAA					
*69:10-70:20	SCOPE; OBJ; R; F					
*71:8-72:18	AAA; OBJ; L					
74:14-20	R; SCOPE		55:2-13	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		
74:25-77:14	SCOPE; F; R; ARG		55:2-20; 76:21- 24	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		
79:19-81:3	SCOPE; F; R; ARG; MIS		55:2-20	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		
81:12-23	SCOPE; F; R; ARG; MIS		55:2-20	55:2-20 Plaintiff's Objections Improper Designation of Attorney Statement		

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DEPOSITION OF PAULEBERTH (06/09/2022) –
DESIGNATIONS; OBJECTIONS AND RULINGS

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
6:9-18	R					
6:21-25	R					
7:3-15	R					
10:22-11:5	R					
12:3-6	R		12:7-9			
15:2-18:25	R		19:1-6			
19:7-20:1	R		20:9-14; 20:17-18; 20:24-21:6			
20:15-16	R		20:9-14; 21:3-6			
21:12-14	R		21:7-11			
21:17-22:3	R		21:15-16			
22:22-23:5	R		22:4-21			
23:23-24:8	R		23:19-21			
24:16-25:10	R					
25:24-26:4	R					
26:7-13	R					
26:24-27:5	AWQ; R; I		28:18-21; 27:6-8			
27:9-13	AWQ; R; I		28:18-21; 27:6-8			
27:19-29:15	R		29:16-30:3			
30:9-23	R					
31:3-6	R					
33:4-15	AWQ; R		33:1-3			
36:16-18	R					
40:2-8	R					
41:1-2	AWQ; R		40:21-25; 41:7-9			
41:11-13	AWQ; R		41:10			
42:25-43:15	R		42:5-10; 43:16-20	42:5-10 Plaintiff's Objection Answer without a question		
44:21-25	R					
45:15-46:12	R; CS		46:13-15			
47:18-23	1002; 701; CS; HYPO; PK; CLC; 403-C		47:24-25			
48:2-25	CLC; HYPO; CS; R					
49:7-13	R					
50:24-51:2	R					

51:5-22 51:24-52:6	R					
55:24-56:2	R					
56:20-58:6	R; CLC					
58:21-23	AWQ; R		58:10-20			
59:21-60:2	R		60:5-12	60:5-12 Plaintiff's Objection Answer without question		
64:20-24	F; R					
65:3-15	R		62:2	62:2 Plaintiff's Objection Improper designation of attorney objection		
*66:17-21	AWQ; R		65:20-66:3			
66:24-67:5	AWQ; R		66:22-23			
68:3-14	R					
69:12-15	R					
69:22-70:15	F; R		71:4-7			
71:23-24	AWQ; R		71:8-13; 71:25- 72:8			
72:9-73:12	AWQ; R; F		71:25-72:			
75:7-8	R					
76:1-15 76:19-77:3	COMP; R; HYPO; F; CS		76:16-18			
78:2-13 78:15-25	R; F; CS					
79:2-3	R; F; CS		78:18-79:1			
88:11-22	R; HYPO; F; CS		88:6-10			
90:4-9	AWQ; R		89:4-90:3			
90:21-25	R					
92:4-11	AWQ; QWA; R		91:17-23; 92:12- 18; 92:23			
92:19-22	I; R		92:12-18; 92:23			
93:15-94:5	AWQ; R		93:13-14			
94:16-96:10	R					
97:3-5	R					
97:20-98:6	R					
103:21-24	AWQ; R		103:15-17			
106:23-107:3	AWQ; R		106:15-22			
107:13-107:17	AWQ; R		107:10-12			
111:1-10	AWQ; R; CLC; HYPO; F; CS		109:23-110:25; 111:22-25; 112:5-9	112:5-8 Plaintiff's Objection		

				Answer without a Question		
116:14-18	R					
117:13-25 118:4-5	CS; R		118:1-3			
120:9-121:2	F; CS; R					
121:6-8 121:10-16	R; F; CS					
122:9-16	R					
122:22-123:5	AAA; F; CS; R		121:14-16			
124:22-125:25	ARG; F; R;		121:14-16			
	AAA					
126:7-14	R					
126:17-127:1	R					
127:12-15 127:17-24	R; I		127:16			
128:1-8	R					
129:10-14	R; CLC; CS		129:2-9			
130:1-12	R; CLC; F; CS					
132:13-15	R					
132:22-133:7	R					
133:22-134:3	R		133:16-21			
136:14-137:6	I; R		136:11-13			
137:11-16	R; I		137:8-10			
138:24-139:21	R					
139:24-140:3	R; I		139:22-23			
140:5;8-12	R					
141:25-142:1	R		141:12-24			
142:3-5	R		142:2			
142:13-143:7	R					
143:17-19	AWQ; R		143:13-16			
*144:9-13	R		144:14-19			
144:20-145:6	R					
145:14-20	AWQ; R		145:7-12; 145:21-23			
146:2-5	R					
146:7-19	R					
147:1-12	R					
147:21-25	R					
148:4-7	R					
148:15-21	QWA; R		148:22-25			
149:1-6	QWA; R		149:7			
149:12-23	R					
150:5-17	R					
151:25-153:8	R; AWQ		150:18-21			
154:17-22	R; F; CS					
155:2-3	R					
*156:7-12	R; F; CS		155:10-14; 156:13-15	156:14-15		

				Plaintiff's Objection Improper Designation of Attorney Statement		
*156:16-20	R; F; CS		155:10-14; 156:13-15	156:14-15 Plaintiff's Objection Improper Designation of Attorney Statement		
*159:25-160:9	R; F					
165:11-14	R		165:15-21			
168:10-14	R					
169:2-20	R		169:21-170:17			
172:2-5	R; F; CS		172:14-15			
*174:7-10	R; F					
*174:22-175:15	R; F; CS		172:14-15			
176:8-9	R					
177:7-12	R					
177:20-178:11	R		178:12-15			
*180:13-181:12	R; F; CS		172:14-15; 181:13-17; 181:25-182:3			
183:18-25	R; F; CS; HYPO					
184:24-185:4	R		185:5-16			
186:12-13	R					
187:13-188:3	R; QWA; F; CS		188:4-11			
188:24-189:3	R		189:4-8			
189:9-22	QWA; R		189:23-190:1			
190:13-17	R					
191:4-192:11	R; F; CS					
192:20-193:8	R; F; CS					
194:1-10	R		194:11-18; 195:6-20			
195:6-17	R		195:18-20			
195:21-23	R					
196:4-7	R					
197:1-21	R; AAA; MT		194:1-18; 195:15-20			
198:15-21	R					
198:25-199:4	R; V					
*199:6-7	R					
*199:23-200:3	R; COMP; F		199:10-11			
*202:16-20	R		202:21-24			

*202:25-203:18	R					
*204:9-12	R					
206:24-207:15	R; F		199:10-11; 207:16-19			
207:20-208:11	R; F		199:10-11; 207:16-19			
*209:20-210:2	R; F		199:10-11; 207:16-19; 213:6-7			
*210:19-22	R		204:9-12; 211:23-212:5	211:23-212:1 Plaintiff's Objection Answer without a Question		
*211:2-6	R		204:9-12; 211:23-212:5	211:23-212:1 Plaintiff's Objection Answer without a Question		
*212:6-13	R		212:14; 213:6-7			
*213:14-214:14	R; F					
215:11-14	R					
216:12-22	R					
*219:5-10	R; F; CS		219:1-4; 219:11-15; 226:13-18			
*219:16-220:3	R; MT		226:13-18			
221:21-24	R; F		222:13-22			
*223:2-11	R; F; QWA		222:13-22; 223:12-14			
*224:6-17	R					
*226:13-18	R; AWQ		225:22-226:12			
*227:12-19	R					
*227:23-228:2	R					
*229:5-13	R; AWQ		228:23-229:4			
231:7-20	R; F; CS					
232:7-22	R; QWA		232:25-233:4			
239:17-240:11	R					
242:21-243:2	R		241:22-242:20			
245:16-17	QWA; R		245:13-15; 245:18-246:2			
246:3-17	R; F; CS		245:16-246:2			
*248:13-15	R					
*248:21-25	R					
*249:15-23	R					
*250:8-11;13-15	R; INCOMP; F		250:12; 250:22-251:2			
*250:22-251:2	R; F					

*252:4-6	R; F; CS		250:22-251:2; 252:7-8			
*252:18-23	AWQ; R; F; CS		252:11-17; 252:24			
*252:25-253:4	R					
*253:10-11	R; N/A Counsel Testifying					
*253:19-254:9	R		254:10-13			
*255:1-4;6-10	R		133:8-21			
256:6-8	R; QWA		256:9-10			
256:11-257:2	R;		257:3-6			
257:7-23	R;		259:8-16; 257:2-6			
258:16-259:6	R; F					
259:13-16	R; F					
259:24-260:2	R					
260:11-19	R; MT		259:24-260:10; 260:20-261:3			
*264:21-265:7	R		264:13-20			
265:12-20; 24	R		265:21-23			
266:3-6; 9	R; CLC; CS		266:8			
266:15-24	R; QWA					
267:18-25	R; AWQ					
268:3-6	R					
268:15-19	R		269:1-3	269:1-3 Plaintiff's Objection Answer without a Question		
*269:4-6	R; QWA		269:7-13			
*269:21-270:2	R					
270:15-18	R					

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

DEPOSITION OF APRIL HOLDREN (08/23/2022) –
DESIGNATIONS; OBJECTIONS AND RULINGS

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
6:14-15	R					
7:10-16 7:20-8:6	R		7:17-19; 9:11-13			
12:25-13:2	R					
13:23-25	R		14:1-8			
14:9-15:7	R		15:8-11; 15:24-16:12			
15:12-15	R		15:8-11; 15:24-16:12			
17:6-9	I; R		16:23-17:5; 17-10-24			
18:25-19:8	R; 403-C; 1002					
23:18-24:2	AWQ; R		22:25-23:17; 24:17-25:2			
26:9-20	R					
33:8-10 33:13-16	R		32:18-33:6			
33:20-36:1	R; H; F; PK; CLC		36:3-8; 38:17-39:13; 163:24-164:1			
37:13-18	R		37:19-22			
38:7-13 38:17-19 38:22-39:10 39:13	R; H; F; PK; CLC		36:3-12			
40:1-7	R; H					
40:12-15	CS; PK; R		40:16-24			
40:25-41:6	R		41:7-15; 41:22-23			
41:24-25 42:3-11	R		42:12-23; 42:1-2			
43:2-5	R		43:7-8			
43:9-44:1	ARG; R; MT		42:16-23; 86:13-23			
44:7-11	ARG; R		44:12-17; 47:19-24	Plaintiff's Objection Outside of Scope of FRCP 32(6)		
44:18-23	R		44:12-17; 45:4-5; 45:20-46:8; 47:7-18	Plaintiff's Objection		

				Answer without a Question Outside of Scope of FRCP 32(6)		
				45:20-46:8 Plaintiff's Objection Outside of Scope of FRCP 32(6)		
				47:7-24 Plaintiff's Objection Outside of Scope of FRCP 32(6)		
53:15-18	AAA; R		53:23-54:4; 86:13-23			
56:6-24 57:2-58:6	ARG; R; CS		55:13-15; 58:13-15; 21:9-12; 35:13-14; 33:24-34:14	55:13-15 Plaintiff's Objection Answer without a Question		
58:13-18 58:21-59:1 59:4-17	ARG; R		34:3-34:14			
62:2-12	R; ARG		60:8-61:1			
63:3-6 63:10-21	R		42:16-23; 63:7-9; 63:24-64:9; 64:23-65:14; 86:13-23	63:7-9 Plaintiff's Objection Improper Designation of Attorney Statement		
64:23-65:3	R		86:13-23			
65:15-22	R		65:23-66:5			
66:6-17 66:20-25	R; 403-C					
67:2-16 67:20-68:4	R; 403-C; H		66:18-19; 67:17-19	67:17-19 Plaintiff's Objection Improper designation of attorney statement		
68:10-11 68:15-20 68:23-69:24 70:2-6; 9	MT; 403-C; R		68:12-14; 68:21-22; 69:25-70:1; 70:7-8	68:12-14 Plaintiff's Objection		

				Improper designation of attorney statement		
70:11-16	R					
71:20-74:6	R		132:16-133:11; 133:17-134:1; 134:7-23			
77:4-11	R		77:14-16; 77:23-78:1; 86:13-23			
78:4-17	R		76:8-76:13; 77:20-78:3			
81:4-10	R					
84:2-4 84:6-7	R		84:9-85:1; 84:5			
85:2-7 85:10-18	403-C; R		84:9-85:12			
85:22-86:8	R		86:13-23			
86:13-19	R		86:20-23			
88:5-9	R					
90:21-91:3	R					
92:25-93:20	R; 403-C		92:19-24; 93:21-94:2			
94:18-95:8	R; 403-C		95:9-11			
95:12-15	R; 403-C		95:6-18; 96:13-19; 97:3-15			
97:20-25	H; R					
98:21-24	H; R					
99:14-17	R					
102:1-7	R					
102:17-20 102:23-24	CS; F; R; 403-C		103:2-13			
103:9-16	F R; 403-C		103:5-8; 103:17-22			
104:17-20	R; F; 403-C					
106:8-13	R		105:22-106:1	105:22-106:1 Plaintiff's Objection Answer without a Question		
117:10-119:6	R; H; ARG		77:20-78:1			
120:16-17	R		120:5-13; 120:16-17; 167:3-4			
125:5-21 125:24-25	R; 403-C					
132:16-133:11	R					
133:17-134:1	R		134:7-23			
136:22-24	R		136:25-137:5			
137:6-7 137:23-24	QWA; R		137:8; 137:21; 137:25-138:1			
139:21-140:16	R		35:13-14			

140:22-141:1	R		35:13-14			
141:13-142:9	R		142:10-14			
144:3-10	ARG; R					
144:24-145:5	R		145:10-11			
145:12-15	R					
145:20-21	R					
145:25-146:7	R					
146:10-11	R		146:8-9; 146:13-17			
147:3-8	R		146:19-147:2; 147:9-12			
147:25-148:2	R		148:6-13			
148:14-18	R		148:19-149:23			
150:15-16	R					
152:12-23	R; CS		152:24-153:3			
153:4-154:5	R		154:12-19; 155:3-9			
158:17-22	R		158:23-159:1			
159:21-24	R; F		159:7-14; 159:25- 160:2			
160:8-161:24	R; H					
164:2-4 164:8-13;15	H; R		163:24-164:1; 35:13-14			
167:5-11	R					
168:16-21 168:25-169:1	R		169:2-6			
172:4-7 172:13-19 172:21;23-24	AAA; ARG; MT; R		172:8-11; 169:22- 23; 170:14-18; 170:25; 171:3-4; 171:8-12; 33:22- 32:3; 32:12-22	169:22-23 Plaintiff's Objection Answer without a Question		
				170:14-18, 170:25, 171:3-4, 171:8-12 Plaintiff's Objection		
				Answer without a Question		
				172:8-1 Plaintiff's Objection		
				Improper Designation of Attorney Statement		
173:9-10 173:14-17 174:3	R					
174:5-15	R; H		174:23-175:19; 174:18-175:8			
181:22-25	R; PK					

182:2;4-6 182:14-15	R; 403-C					
182:18-21	R; H					
183:1-3	R					
186:13-24	R; 1002; 403-C; PK; CS					
187:12 188:13-14	R; 1002; 403-C; PK; CS					
188:20-25	R; 1002; 403-C; PK; CS					
189:5-20	R; 1002; 403-C; PK; CS; F					
192:9-18 192:21-23	R; 403-C; F; PK					
195:19-196:16	R	45:4-5; 46:5-8; 47:18; 266:24-267:4; 291:25-292:1	291:25-292:1 Plaintiff's Objection Answer without a Question Outside Scope of FRCP 32(6).			
197:14-198:14	R					
200:11-22	R					
201:21-25	R					
205:17-207:14 207:17-18	R	207:20-208:4				
208:20-209:8	R					
211:15-20	R					
212:2-4 212:7-17	R					
213:1-4	R	213:8-14				
213:21-214:5	R					
214:21	R					
217:22-218:5	R	217:19-21				
221:23-222:1	R	221:17-20				
225:1-18 225:21-22	MT; CLC; ARG; R	225:19-20	225:19-20 Plaintiff's Objection Improper Designation of Attorney Statement			
225:25 226:10-17	R					
228:4-8 228:10-229:13	MT; R	228:9				
233:9-10	R					
233:20-234:3	R	234:9-10	234:9-10			

				Plaintiff's Objection Answer without a Question		
234:16-21	R		235:3-5; 237:6-7	235:3-5 Plaintiff's Objection Answer without a Question		
				237:6-7 Plaintiff's Objection Answer without a Question		
237:8-11	R					
239:3-7	R					
242:19-243:5 243:8-15 243:18-21 243:25	CS; R; 701; 403-C					
244:6-9; 12-13	R					
245:8-16	R		245:17			
246:10-13 246:17-247:4	R					
248:4-7	R					
249:6-10	R		249:11-16			
251:7-13	R					
253:23-254:9	R					
254:12-255:3	R					
255:7-20	R		255:21-256:6; 258:5	258:5 Plaintiff's Objection Answer without a Question		
257:18-22	R		255:21-24; 257:18- 22; 258:5	258:5 Plaintiff's Objection Answer without a Question		
258:10-17	I; R		258:18-25			
259:11-12	AWQ; R		259:5-10			
260:19-20	AWQ; R		260:9-18			
262:13-16 262:20-21	R; ARG					
263:25-264:14	R; 403-C		264:15-19			
264:23-265:1	403-C		264:15-19			
265:10-13	R					

265:14-16 265:18 266:3-19	R		266:24-267:7	266:24-267:4 Plaintiff's Objection Answer without a Question		
268:1-19	R		14:16-18; 15:8-15; 58:13-15; 328:21- 329:1			
268:24-269:1; 4	R		268:20-23			
269:6-270:9 270:12-271:1	ARG; MT; R		269:2-3; 270:10-11	269:2-3 Plaintiff's Objection Improper Designation of Attorney Statement		
271:6-10	R					
271:14-24	R		73:25-74:2; 305:13-305:15; 132:20-25; 133:17- 20; 134:7-13			
273:20-21 273:24-274:18	R					
274:25-275:3	R					
275:6-7	R; CLC					
275:14-18	R					
275:24-276:1	R					
276:5-277:1	R		203:6-205:3			
277:3-4	R					
280:11-12	R		280:19-21			
280:25-281:2	R		280:19-21			
282:16-17	R					
282:22-283:1 283:4-284:12	F; R		309:17-311:7; 311:11-312:11	311:11-312:11 Plaintiff's Objection Outside of Scope of 32(6)		
284:14-18 284:24-285:14	AWQ; F; R		284:13; 312:12- 313:8			
286:19-23	I; AWQ; F; R		286:10-18; 286:24- 287:3			
287:4-7	R		287:8-10			
287:11-14 287:17-24	R		287:25-288:2			
289:14-15 289:18-290:1	R; CS; PK					
290:18-291:7	CS; R					
291:9-16	F; R		313:14-314:10			

293:1-2	R					
293:15-23	R					
294:10-14	R; 403-C		85:10-12; 186:5-7			
294:16-19	408(a); R		294:21-22			
296:3-4	AWQ; R		295:20-296:2			
296:9 296:12-16	R					
297:13-298:5	R					
298:10-12	R		298:6-9			
298:20-299:2	F; R		314:15-315:5			
299:16-19	F; R		299:3-12; 315:8-316:6	311:11-312:11 Plaintiff's Objection Outside of Scope of 32(6)		
300:8-25	R		44:18-45:5; 46:5-8; 46:11; 47:3-12; 47:18; 195:25- 196:9; 291:25- 292:1	291:25-292:1 Plaintiff's Objection Answer without a Question Outside Scope of FRCP 32(6).		
301:4 301:6-11	R					
301:19	R					
302:5-11	R; 1002; 701; 403-C; F; CS		302:1-4			
302:24-303:1	R; 1002; 701; 403-C; F; CS		303:12-13; 22-23			
303:15-16	R; 1002; 701; 403-C; F; CS					
304:17-20	403-C					
305:1-306:10	R; H					
319:14	F; R		309:17-311:7; 320:16-321:2			
319:19	R					
319:23-320:7 320:10-15	R		320:16-25			
321:6-7	R; F		309:17-311:7; 320:16-321:2; 321:8-10; 320:13- 17; 322:12-17			
321:18-21 321:24-322:4 322:7-11	CS; F; R		309:17-311:7; 320:16-321:2; 321:8-10; 321:22- 23; 311:11-312:11; 322:12-17	311:11-312:11 Plaintiff's Objection Outside of Scope of 32(6)		
322:18-20	R		323:18-25			

323:5-6	F; R		312:12-313:8			
323:10-13 323:16-24 324:2-13	CS; F; R		312:12-313:8; 313:14-314:10; 324:20-24			
324:16-19	R; F		324:20-24			
325:20-326:16	R; ARG					
326:25-327:22	R; H		328:21-329:1	328:21-329:1 Plaintiff's Objection Answer without a Question		

*Confidential and attorney's eyes only (AEO) designations for this deposition have not yet been exchanged

**DEPOSITION OF SARA PLOETZ (05/13/2022) –
DESIGNATIONS; OBJECTIONS AND RULINGS**

Plaintiff provided corrected designations for Sara Ploetz to Enbridge on October 5, 2022. Plaintiff has not received objections and/or counter-designations from Enbridge to these designations. Plaintiff will update this document when they are received.

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
11:8-15						
12:2-8						
12:13-13:2						
14:14-21						
15:24-16:6						
18:21-23						
19:9-15						
19:20-23						
24:8-25:20						
25:24-26:2						
26:7-27:11						
27:13-27:24						
28:4-9						
28:16-23						
32:3-18						
34:9-14						
34:8-35:1						
41:1						
42:13-19						
43:4-13						
44:7-17						
44:22-45:11						
45:18-46:14						
46:24-47:5						
48:2-50:24						
54:1-55:25						
58:10-24						
65:18-66:1						
68:4-18						
68:24-69:7						
71:11-19						
72:23-73:18						
73:25-74:14						
76:4-24						
77:3-8						
77:16-21						
78:19-22						
79:5-9						
81:19-25						
83:1-15						
90:12-14						

90:16-17						
90:21						
106:5						
108:22-109:8						
109:19-24						
110:10-11						
116:13-23						
135:21						
136:6-138:22						
143:22						
144:14-145:8						
146:12-17						
147:1-4						
151:2-9						
152:12-14						
157:14-24						
158:9-23						

DEPOSITION OF PETER SONG (05/25/2022)**DESIGNATIONS; OBJECTIONS AND RULINGS**

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
16:19-17:10			93:4-95:21			
40:16-41:3			67:12-68:12; 77:12-19; 78:25- 79:11			
44:19—45:16			29:18-22; 31:11- 32:14; 33:25- 34:10; 46:15- 47:25; 49:1-6; 49:25-50:15; 51:3- 7; 51:22-53:22; 54:8-55:25; 97:14- 98:4; 125:3-125:9	29:18-22 Plaintiff's Objection Answer without a Question Improper Designation of Testimony Outside of Scope of FRCP 32(6). 31:11-32:14 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). ----- 33:25-34:10 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 46:15-47:25 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 49:1-6		

				Plaintiff's Objection Answer Without a Question Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				49:25-50:15 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				51:3-7 Plaintiff's Objection Answer Without a Question Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				51:22-53:22 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				54:8-55:8 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		
				55:9-20 Plaintiff's Objections		

				Improper Designation of Attorney Statements		
56:12-57:20			58:7-21; 61:1-9; 62:2-6; 64:20-65:8; 66:2-9; 97:14-98:4	66:2-9 Plaintiff's Objection Answer Without A Question		
70:1-3 70:12-13						
74:13-75:11						
91:11-92:18			93:4-95:21			
102:15-103:8			93:4-95:21; 103:10-104:9			
104:11-23						
105:24-106:12						
106:16-108:17			93:4-95:21			
112:15-23						
*122:4-123:21			77:24-78:4; 100:18-20; 100:24- 101:11; 120:15- 120:18; 130:16-19; 131:17-132:6	77:24-68:4 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 100:18-20, 100:24- 101:11 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6). 120:17-18 Plaintiff's Objection Improper Designation of Testimony Outside of Scope of FRCP 32(6).		

*Denotes material Enbridge asserts is attorney's eyes only (AEO) or confidential within the deposition transcript designations

DEPOSITION OF COLIN McGUIRE (06/06/2022) –
DESIGNATIONS, OBJECTIONS AND RULINGS

Pursuant to the Court's Order and Opinion (Dkt. No. 521), Plaintiff has included designations for Colin McGuire. Plaintiff will update its filing with Defendant's objections and/or counter-designations and any Plaintiff objections thereto upon receipt.

Plaintiff's Designations	Defendants' Objections	Court Ruling	Defendants' Counter-Designations	Plaintiff's Objections to Counter-Designations	Plaintiff's Counter Designations	Court Ruling
13:12-14:3						
14:6-18						
15:19-25						
17:11						
18:24-25						
19:4-6						
22:23-25:7						
26:8-15						
27:4-7						
27:15-28:13						
28:18-29:8						
29:23-30:3						
30:10-12						
30:19-23						
31:11-17						
32:3-14						
34:10-18						
34:23-36:13						
36:17-22						
38:2-3						
39:5-10						
*40:11-41:6						
*41:16-42:3						
44:9-11						
45:14-14						
*45:19-25						
46:7-10						
46:19-22						
*48:1-21						
48:23-49:11						
*49:13-50:5						
*50:23-51:14						
*52:1-4						
53:2-3						
*53:10-17						
54:3-6						
54:10-14						
*54:18-55:3						
55:24-56:12						
*56:16-57:11						
*57:19-58:14						

*59:1-11						
*59:14-60:13						
60:21-61:6						
61:15-17						
62:3-62:14						
62:17-64:14						
65:20-22						
65:25-66:5						
*66:13-23						
*67:13-16						
*68:6-11						
70:1-8						
*70:10-15						
70:24-*71:1						
71:6-18						
72:3-7						
72:12-16						
73:3-6						
73:10-11						
*73:19-74:19						
74:25-75:2						
75:13-15						
75:19						
76:1-3						
*77:7-12						
*77:19-22						
77:24-25						
*78:4-7						
79:5-7						
79:18-22						
*80:2-16						
80:24-25						
81:3-14						
*81:16-20						
82:1-9						
83:3-5						
*83:7-12						
*83:15-84:12						
84:16-17						
84:21-23						
85:5-6						
85:9-14						
85:16-19						
*86:5-87:7						
87:17-21						
87:24-88:9						
*89:2-9						
*89:16-18						
92:15-22						
*93:10-94:2						
94:4-5						
94:7-9						
*94:11-24						

95:21-25						
96:11-14						
97:18-22						
97:24-98:13						
98:17-25						
99:24-100:2						
100:4-5						
*100:8-13						
*100:19-24						
101:2						
101:7-12						
101:19-102:1						
102:12-17						
102:21-103:1						
103:6-9						
104:6-7						
105:4-6						
105:16-21						
106:2-3						
106:6-7						
*106:12-16						
106:21-22						
*107:8-108:20						
108:24-109:3						
110:9-14						
110:18-20						
110:23						
111:7-8						
111:11-14						
*111:20-113:9						
*113:23-114:8						
114:14-25						
*116:2-117:4						
118:20-119:12						
119:20-22						
120:19-20						
121:1-7						
121:14-122:5						
*122:20-22						
*123:2-8						
123:19-24						
*124:2-23						
125:2-13						
125:18-24						
126:4-6						
126:9-10						
126:13-14						
126:19-20						
127:14-128:16						
131:23-24						
*132:9-24						
133:2-4						
133:6-9						

134:16-135:17						
135:20-136:9						
136:17-137:13						
138:19-21						
139:1-5						
141:4-8						
141:20-142:2						
143:3-14						
144:4-14						
144:17-22						
145:5-9						
145:23-146:9						
146:20-21						
*147:15-20						
149:15-16						
*149:19-150:5						
*150:13-16						
151:4-15						
151:18						
152:6-9						
152:18-19						
152:23-24						
153:1-8						
153:11-25						
154:4-6						
154:11-17						
155:15-17						
156:11-15						
156:20-159:1						
159:4-13						
160:25-161:5						
162:9-23						
163:18-22						

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Dated: October 8, 2022

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